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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANELLE BLANGERES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNITED STATES SEAMLESS, INC.,
and KAYCAN LIMITED,

Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
*PRO HAC VICE***

Charles Schaffer (the "Applicant") hereby moves the Court to enter an order permitting him to participate in this case *Pro Hac Vice* as counsel for Plaintiffs Robert and Danelle Blangeres ("Plaintiffs"), pursuant to Local Rule 83.2(c). In support of this Motion, the Applicant states as follows:

1 1. The Applicant is a partner in the law firm of Levin, Fishbein, Sedran
2 & Berman in Philadelphia, Pennsylvania.

3 2. The Applicant is a member in good standing of the bars of several
4
5 United States federal courts and the highest state courts of Pennsylvania and New
6 Jersey.

7 3. The Applicant does not reside in the State of Washington and does
8
9 not maintain an office in the State of Washington.

10 4. The Applicant responds to the information requested in Local Rule
11 83.2(c)(2) as follows:

12 (a) The Applicant's address and telephone number are 510
13
14 Walnut Street, Suite 500, Philadelphia, Pennsylvania, 19106-3697, telephone:
15 (215) 592-1500; facsimile: (215) 592-4663; email: cschaffer@lfsblaw.com.
16

17 (b) The dates of admission to practice before other courts are
18 listed below:

<u>State Bar Admissions</u>	<u>Date Admitted</u>
Pennsylvania	11/27/1995

<u>Federal Bar Admissions</u>	<u>Date Admitted</u>
Eastern District of Pennsylvania	02/05/1998
Third Circuit Court of Appeals	03/31/1998

1 Central District of Illinois 03/14/2011

2 Northern District of Illinois 01/30/2012

3 Middle District of Pennsylvania 04/13/2012

4 Sixth Circuit Court of Appeals 11/14/2012

5 Northern District of New York 03/07/2013

6 District of Colorado 07/15/2013

7
8
9 (c) The name, address and telephone number of admitted counsel
10 with whom the Applicant will be associated are: Beth E. Terrell and Erika L.
11 Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite
12 400, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206)
13 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.
14

15 (d) The Applicant's appearance is necessary because Plaintiffs in
16 this action have retained him in this action.
17

18 (e) There are no disciplinary sanction actions pending against the
19 Applicant and the Applicant has never been subject to any disciplinary sanctions
20 by any court or Bar Association.
21

22 5. The Applicant understands that if he is admitted *Pro Hac Vice* he
23 will be subject to the disciplinary jurisdiction of this Court.
24

25 6. The Applicant is familiar with the facts, issues and documents
26 associated with this case.

7. The Applicant is familiar with the local rules of this Court.

WHEREFORE, Charles Schaffer respectfully requests that the Court enter an order in the form proposed granting the admission *Pro Hac Vice* of Charles Schaffer during the pendency of this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 8-12-13

~~Charles Schaffer, Applicant~~

STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that Erika L. Nusser and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Charles Schaffer is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 12th day of August, 2013.

TERRELL MARSHALL DAUDT
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By: /s/ Beth E. Terrell, WSBA #26759

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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on August 20, 2013:

1. I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Gregory J. Arpin, WSBA #2746
Attorneys for Defendant United States Seamless, Inc.
PAINE HAMBLLEN LLP
717 W. Sprague Avenue Suite 1200
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2. On August 20, 2013, I caused true and correct copies of the above-referenced documents to be delivered to the following who were not served through the Court's CM/ECF system in the above-captioned matter, by electronic mail and by United States Postal Service U.S. mail, postage prepaid, from Seattle, Washington:

1 Jon R. Brakke
2 Attorneys for Defendant United States Seamless, Inc.
3 VOGEL LAW FIRM
4 218 NP Avenue
5 P.O. Box 1389
6 Fargo, North Dakota 58107-1389
7 Telephone: (701) 237-6983
8 Facsimile: (701) 476-7676

9 DATED this 20th day of August, 2013.

10 TERRELL MARSHALL DAUDT
11 & WILLIE PLLC

12 By: /s/ Beth E. Terrell, WSBA #26759
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20 *Attorneys for Plaintiff*